

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

ANDY KIM, in his personal capacity as a candidate for
U.S. Senate, ANDY KIM FOR NEW JERSEY, SARAH
SCHOENGOOD, SARAH FOR NEW JERSEY,
CAROLYN RUSH and CAROLYN RUSH FOR
CONGRESS,

Plaintiffs,

Civil Action No. 3:24-cv-01098

v.

CHRISTINE GIORDANO HANLON, in her official
capacity as Monmouth County Clerk; SCOTT M.
COLABELLA, in his official capacity as Ocean County
Clerk; PAULA SOLLAMI COVELLO, in her official
capacity as Mercer County Clerk; MARY H. MELFI, in her
capacity as Hunterdon County Clerk; STEVE PETER, in
his official capacity as Somerset County Clerk; HOLLY
MACKEY, in her official capacity as Warren County Clerk;
NANCY J. PINKIN, in her official capacity as Middlesex
County Clerk; JOSEPH GIRALO, in his official capacity as
Atlantic County Clerk; JOHN S. HOGAN, in his official
capacity as Bergen County Clerk; JOANNE SCHWARTZ,
in her official capacity as Burlington County Clerk;
JOSEPH RIPA, in his official capacity as Camden County
Clerk; RITA M. ROTHBERG, in her official capacity as
Cape May County Clerk; CELESTE M. RILEY, in her
official capacity as Cumberland County Clerk;
CHRISTOPHER J. DURKIN, in his official capacity as
Essex County Clerk; JAMES N. HOGAN, in his official
capacity as Gloucester County Clerk; E. JUNIOR
MALDONADO, in his official capacity as Hudson County
Clerk; ANN F. GROSSI, in her official capacity as Morris
County Clerk; DANIELLE IRELAND-IMHOF, in her
official capacity as Passaic County Clerk; and JOANNE
RAJOPPI, in her official capacity as Union County Clerk.

Defendants.

-and-

DALE A. CROSS, in his official capacity as Salem County
Clerk; and JEFF PARROTT, in his official capacity as

Sussex County Clerk; TAHESHA WAY, Esq., in her official capacity as Secretary of State for New Jersey.

As Interested Parties.

**DECLARATION OF RAVI BHALLA IN SUPPORT OF AMICUS CURIAE BRIEF OF
JOE COHN, STACI BERGER, JAMES SOLOMON, VALERIE HUTTLE, AND RAVI
BHALLA IN SUPPORT OF PLAINTIFFS' MOTION FOR PRELIMINARY
INJUNCTION**

RAVI BHALLA hereby declares, pursuant to 28 U.S.C. § 1746 as follows:


1. I am Ravi Bhalla. I reside at (837 Garden St, Hoboken, NJ 07030), New Jersey. I am the Mayor of Hoboken and provide this certification to provide the Court with my experiences with "county line" (hereinafter, "Line") balloting as well as the alternative balloting used in Hoboken municipal elections. I have direct and recent experience with the use of the Line and its detrimental effects on open and fair primary elections. I describe that experience below.

2. In 2015, I explored a run for the State Assembly. As part of this consideration, I sought to be placed on the Line for Hudson County from the Hudson County Democratic Organization (HCDO). The HCDO does not hold a convention where local Democrats hear speeches from the candidates and then vote on which ones will receive its endorsement. Instead, the decision as to which candidates will be placed on the Line is controlled by a few party insiders who hold power and make the determination behind closed doors with no public process. Despite this hidden and undemocratic approach, the HCDO's decision appears on the official ballot circulated by the County Clerk. This is a direct migration of a *private* (that is, the Party organization) decision then being incorporated entirely into a *public* (that is, the primary election ballot) document and process.

3. As I continued my exploration campaign, there came a time where it became apparent that I would not be able to secure the endorsement of the HCDO and would not be placed on the Line. In Hudson County, the inability to appear on the Line represents a death knell for a candidate's primary campaign. As such, because I was unable to secure a position on the Line, I ended my candidacy. The result was that because a handful of party insiders had made a far from transparent decision regarding the Line, the Democratic Party primary voters as a whole were deprived of a say in whether I should represent them in a general election. Ultimately, in Hudson County, one of our state's most vibrant, diverse, and economically impactful counties, our democratic process is antidemocratic.

4. By sharp contrast and equally direct personal experience, in Hoboken, we have non-partisan elections in which ballot position is selected randomly. And even if one gets a preferred position such as the first listing, it does not represent a meaningful advantage. Having personally run in three competitive, citywide elections in [2009, 2013, and 2017] - two for council and one for mayor respectively - I found this to be a fair method of practicing democracy. The random selection of placement levels the playing field and eliminates obstacles to entry for new candidates with fresh ideas and a willingness to serve in public office. The open nature of the process also inspires greater public confidence because it avoids preferred treatment to friends or individuals that contribute to the county organizations. It also adds needed legitimacy to this local method of electing city leaders at a time when cynicism about our elections is at an all-time high.

Executed on March 11, 2024


Ravi Bhalla